IN RE: ERIK E. SANCHEZ	:	CHAPTER 13
Debtor	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
ERIK E. SANCHEZ	:	
Respondent	:	CASE NO. 1-24-bk-00065

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this   21st   day of March, 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1.   Debtor(s)' plan violates 11 U.S.C. § 1322(a)(2) in that the debtor(s) has not provided for full payment, in deferred cash payments, of all claims entitled to priority under 11 U.S.C. § 507 – estimated tax claim by York Adams Tax Bureau.

2.   The Trustee provides notice to the Court as to the ineffectiveness of debtor(s) Chapter 13 Plan for the following reasons:

  a.   The Plan contains inappropriate nonstandard provisions(s), contrary to § 1322(b)(11).   See *In re Parkman*, 589 B.R. 567, 574 (Bankr. S.D. Miss. 2018); *In re Mank,* No. 19-04199, 2020 WL 1228671 at *2 (Bankr. E.D.N.C. Mar. 3, 2020).

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

  a.   Deny confirmation of debtor(s) plan.

b. Dismiss or convert debtor(s) case.
c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/Agatha R. McHale
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this   22nd   day of March, 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Gary Imblum, Esquire
4615 Derry Street
Harrisburg, PA   17111

/s/Deborah A. DePalma
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee